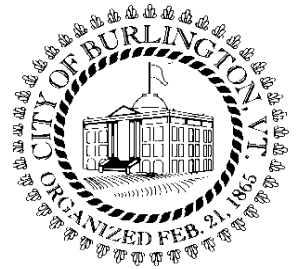


Department of Permitting and Inspections

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MEMORANDUM

To: The Design Advisory Board
From: Mary O'Neil, AICP, Principal Planner
RE: 273 Pearl Street, 11, 15 and 21 Hungerford Terrace
ZP20-0717CA/MA, ZP20-0718CA, ZP20-0719CA, ZP20-0720CA.
First DAB meeting: July 14, 2020
Revised Plans received: August 7, 2020
Date: August 25, 2020

File: ZP20-0717CA/MA, ZP20-0718CA, ZP20-0719CA, ZP20-0720CA.

Location: 273 Pearl Street, 11, 15 and 21 Hungerford Terrace

Zone: RH **Ward:** 8E

Parking District: Neighborhood

Date application accepted: February 20, 2020. Project review delayed by Covid 19, and plan revisions (submitted June 11, 2020 and August 7, 2020.)

Applicant/ Owner: 18138 Parking LLC, Triple Tree Group, LLC, 15 Hungerford Terrace, LLC and 21 Hungerford Terrace LLC. (Bruce Baker, Greg Doremus.)

Request: Planned Unit Development to include demolition of a single family home at 15 Hungerford Terrace and a garage at 11 Hungerford Terrace; demolish south porch and move garage at 21 Hungerford Terrace; construct 12 unit residential building. Net new new units = 11 (if earlier duplex approvals are relinquished.) Site changes, including retaining walls. Parking changes with 17 space parking waiver request (42% of required residential parking.)

Changes to the staff report are in **red**.

Background:

273 Pearl Street (constructed 1952)

- **Zoning Permit 16-0273CA;** replace 3 windows. September 2015.
- **Zoning Permit 15-0427CA; regrade portion of lot and install retaining wall.** Also see 15 and 21 Hungerford Terrace. September 2014.
- **Non-applicability of Zoning Permit Requirements 15-1015NA;** roof replacement. April 2015.
- **Zoning Permit 12-0231FC;** install chain link security fence on top of existing concrete block wall. September 2011.



- **Zoning Permit 00-466**; reside existing medical (dental) office in vinyl siding with new front elevation changes that include new windows, door and unenclosed entry roof canopy. No increase in coverage. Front yard setback encroachment allowed as per 5.3.6 (g). April 2000.
- **Zoning Permit 81-305**; change existing office to dental office. January 1981.
- **Zoning Permit n.n.**; Enlarge existing non-conforming use by addition of 21' x 16'. Approved May 1965.
- **Zoning Permit n.n.**; three unilluminated signs. Approved July 1960.
- **Notice to Gates Professional Pharmacy, sign exceeding size permitted in Zone One.** August 1952.
- **Petition to building a one story building approximately 24' x 40' to be used as prescription laboratory, doctor's office or professional use.** Approved December 1951.

11 Hungerford Terrace (constructed 1912)

- **Zoning Permit 18-10990CA**; handicap ramp, stoop, addition, parking changes. Convert a portion of the garage's front wall into a retractable wall to accommodate interior parking. July 2018.
- **Zoning Permit 18-0812CA**; replacement windows. April 2018.
- **Non-applicability of Zoning Permit Requirements 12-0252NA**; replace retaining wall in kind at same location & same height. August 2011.



15 Hungerford Terrace (constructed 1994)

- **Zoning Permit 18-1091CA**; change of use from single family to duplex. Parking changes. July 2018.
- **Zoning Permit 15-0428CA**; regrade portion of lot and install retaining wall. See also 21 Hungerford Terrace and 273 Pearl Street. Issued September 2014; permit relinquished.
- **Zoning Permit 02-377**; Construct 60' retaining wall. Issued March 2002, permit relinquished.
- **Zoning Permit 96-407**; installation of skylight in single family home. April 1996.
- **Zoning Permit 094-059 and 94-059A**; construction of a single-family home on existing vacant lot. February 1994.



21 Hungerford Terrace (constructed 1922)

- **Zoning Permit 18-1092CA;** Change of use from single family to duplex; add habitable space to basement. Shared parking and driveway with 11 and 15 Hungerford. See related permits AP18-1090CA and ZP18-1091CA. July 2018.
- **Zoning Permit 15-0429CA;** regrade portion of lot and install retaining wall. See also 15 Hungerford Terrace and 273 Pearl Street. Permit issued September 2014; permit relinquished.
- **Zoning Permit n.n.;** Use two front rooms for doctor's office. ZBA approved April 1966.



Overview:

The application is for a Planned Unit Development, utilizing 273 Pearl Street, 11, 15 and 21 Hungerford Terrace to create a new 12 unit residential building on the site of 15 Hungerford which will be demolished. One accessory building (garage, 11 Hungerford) and a porch (21 Hungerford) are proposed to be removed and the garage at 21 Hungerford relocated. A retaining wall will be constructed to ameliorate the grade change west of Hungerford Terrace. Parking changes, 17 space (47.22% residential) parking waiver request.

Article 6: Development Review Standards

Part 1: Land Division Design Standards

No land division or boundary line adjustments are proposed. As a Planned Unit Development (PUD), the development area will be reviewed by the DRB under Article 11.

Part 2: Site Plan Design Standards

Sec. 6.2.2 Review Standards

(a) Protection of Important Natural Features

The most significant feature of the site is the topographic change from east to west. See “Topographical alterations”, below.

There are two mature trees within the ROW in front of 21 Hungerford that are identified on Plan A1 for retention, and a large tree in the front yard of 15 Hungerford Terrace to be removed. At least 17 trees are proposed to be removed from the collective project area. **A landscaping plan has been provided (A3) defining new plantings and location.**

(b) Topographical alterations

The rear of this development area reflects a tangible remnant of Burlington's physical geography, the Burlington Ravine. Previous permitting illustrates the efforts made to address the significant grade changes in the rear of these four properties. Plan A0 defines the grade low as



220' on the west of the site; increasing to 240' on the east (Hungerford Terrace) side. The plan includes retention of the existing concrete block retaining wall behind 273 Pearl Street, with a connecting retaining wall running around the west and south end of the development area raising the grade from 220 to 232 (see Civil Plan C2.2.) The proposed retaining wall will reach heights of 11' along the westerly wall, requiring approval of the City Engineer.

Hungerford Terrace at the top, Pearl to the left. Grade change to the west (bottom) evident.

(c) Protection of important public views

There are no protected important public views from or through the property.

(d) Protection of important cultural resources

See Section 5.4.8 (b).

(e) Supporting the use of alternative energy

Floor plans illustrate ERV (Energy Recovery Ventilator) closets. Other alternative energy options, including solar for the large flat roof, are encouraged.

(f) Brownfield sites

The properties are not listed on the Vermont DEC Hazardous Waste Site. Not applicable.

(g) Provide for nature's events

A subsurface stormwater treatment vault is present on Civil plans C2.2 and includes a Stormwater Retention component located under the new parking area. The EPSC and Stormwater management plans were forwarded to Stormwater Engineering Division for review.

Snow storage is identified on the northerly end of the parking area just north of the three parking spaces.

(h) Building location and orientation

The demolition of 15 Hungerford Terrace affords the location of the new, 3 story 12 unit residential building. The front setback duplicates that of the building to be demolished, with the footprint expanding further west, consistent with the setback average of the three neighboring properties. (Average setback is 47.4' when averaging 11, 21 and 27 Hungerford. Front setback

may be +/- 5' of that average.) **Retention of the existing setback, to the same degree, is acceptable.**

(i) Vehicular access

The access drive for all units is proposed south of 21 Hungerford Terrace, via an existing driveway. Plans A0 and A1 both define existing driveway encroachment onto a neighboring property. All access must be established within the PUD property boundaries, with no further encroachment into setbacks than existing conditions.

(j) Pedestrian access

Existing front entrance walks connecting to the city public sidewalk will remain at 11 and 21 Hungerford. A new walkway will be introduced to the immediate south of the 3 story residential building, with common ground floor entry at its terminus.

(k) Accessibility for the handicapped

Unit 1 is identified as fully accessible, with Units 2, 3 and 4 as “adaptable”. The eight remaining units on the 2nd and third floor will meet Visitability standards for access.

2 ADA parking spaces are provided (one immediately behind 21 Hungerford, and one to the north of the new building at 15 Hungerford; **both providing a loading area.**) The building inspector has jurisdiction relative to the acceptability of the number of spaces and their specific dimensions.

(l) Parking and circulation

Plan A1 provides 25 parking spaces:

273 Pearl Street will retain its 6 existing permitted parking spaces for the dental office/1 residential unit.

11, 15 and 21 Hungerford (18 units) will share 19 parking spaces.

The requirements within the Neighborhood Parking District are 2 parking spaces for every residential unit.

Zoning Permit 18-1090CA allowed a shared parking arrangement among 11 Hungerford (5 units), 15 and 21 Hungerford Terrace that provided a total of 19 parking spaces. For the total 9 units, that plan met required on-site parking (2 per unit, or $2 \times 9 = 18$ spaces.)

The current plan proposes **19 spaces** for residential use while the required parking for 18 units (5 units at 11 Hungerford, 12 units at 15 Hungerford, and 1 unit at 21 Hungerford) if earlier permit for duplex is relinquished) is now **36 spaces**. Only one net new additional space is provided greater than the previously approved shared use parking plan for 11, 15 and 21 Hungerford Terrace. With a substantial increase in bedroom count (33 bedrooms in 15 Hungerford), the parking deficiency is marked.

Discounting the dental office/1 apartment use at 273 Pearl which remains constant, the proposal is deficient (36-19) by 17 parking spaces, requiring a 47.22% parking waiver.

Parking spaces north of the new building are standard parking spaces (9 x 20); all of the spaces on the westerly boundary are compact (8 x 18); and the four immediately west of 15 Hungerford are undersized (8 x 16) per Table 8.1.8-11 of the ordinance. All spaces lack the required backup space (24' for 90° standard size angled parking spaces) although the most westerly meet the requirement for compact spaces (20' backup.) The h/c space south of 15 Hungerford, the lone

garage space, and the southerly space immediately west of 15 Hungerford are all deficient in back-up space. The applicant will rely Section 8.1.11 that permits the DRB discretionary review to determine a lesser standard necessary due to site topography, location of existing or proposed structures, lot configuration, and/or the need to preserve existing trees and vegetation.

A Parking management Plan has been submitted, weighing largely on tenants without cars, advantageous location near the downtown, and shared parking by critical use periods. The plan proposes use of 5 residential parking spaces by the dentist office during business hours, when residential tenants would vacate their spaces. The plan further hinges on specific tenant selection practices and required tenant education. Both of these tools rely on the methods and practices of current owners; their continued success largely reliant under practices of unknown future ownership.

Finally, the applicant/owners include up-front monthly charges for parking on-site to discourage vehicular ownership. Parking is permitted on-site by permit and assigned space only, with towing enforced. As proposed, there is just one parking space per residential unit.

Owners will provide information to tenants about ridesharing programs and maintain a group membership with Car Share Vermont, offering to tenants free of charge. CCTA bus passes are provided to tenants on a first-come basis. Bicycle parking and storage is provided on site. Grocery trollies will be made available to tenants.

The applicants have also requested consideration of sharing all parking from their 5 commonly owned lots within 3 blocks; a total of 128 parking spaces. An examination of all those parcels and their parking requirements are outside this project review, but suggest the potential for private TDM (Transportation Demand Management) within the City. While advanced, TDM as practice is not yet incorporated as part of Parking Management opportunities within the Comprehensive Development Ordinance, and **at this time prove challenging** for future compliance and enforcement of individual properties.

Article 8 defines the requirement to meet the parking demand of new development effectively. A proposed parking management plan must guarantee present and future success, enforceable over the long term. The creation of 33 new bedrooms with only one new parking space is challenging; and hinged in this application with active and enduring control by owners.

Surface parking requires shading to reduce the effect on the local microclimate, air quality, and stormwater runoff. New or substantially improved parking areas must shade at least 30% of the parking lot. 1 shade tree shall be provided for every 5 parking spaces with a minimum caliper size of 2 ½ -3" at planting. A **significant** number of existing trees will be removed for this redevelopment. **Plan A3 details the addition of 2 Honey Locust and 2 Elms; the remainder of the plantings shrubs and ornamentals. Plan A4 illustrates site shading. While a portion of the paved area is shaded in late June (a.m.), the 30% shading requirement is functionally met during the winter months when the sun is at its lowest.**

Bicycle parking is provided along a walkway to the newly developed 15 Hungerford Terrace. Long Term bicycle parking is afforded in a separate room in the basement of 15 Hungerford Terrace. **(See plan A5.)** With 33 new bedrooms, at least 17 long term bicycle parking spaces will

be required for the residential use. (1 bike parking/2 bedrooms requirement). This is more fully addressed under Article 8.

(m) Landscaping, fences and retaining walls

A separate landscaping plan **has been** provided, **and** alluded to in plan A0, A7 and A8. **Plan A3 provides Boston Ivy (K) as one of the plantings, its location unidentified on the site plan. There is inconsistency between Plans A3 and A9 relative to landscaping and proposed locations. (“Karl Forrester grass, Boston Ivy” on the retaining wall; not illustrated on A3.) Perhaps those are proposed on an abutting property?**

This standard requires:

Retaining walls greater than 5 feet tall shall incorporate textured surfaces, terracing, and/or vegetation to avoid long monotonous unarticulated expanses and to minimize adverse visual impacts to neighboring properties. As with fences, retaining wall styles, materials, and dimensions shall be compatible with the context of the neighborhood and use of the property.

Civil plans C2.2 and C4.2 and Plan A8 define the gravity wall as terraced with plantings.

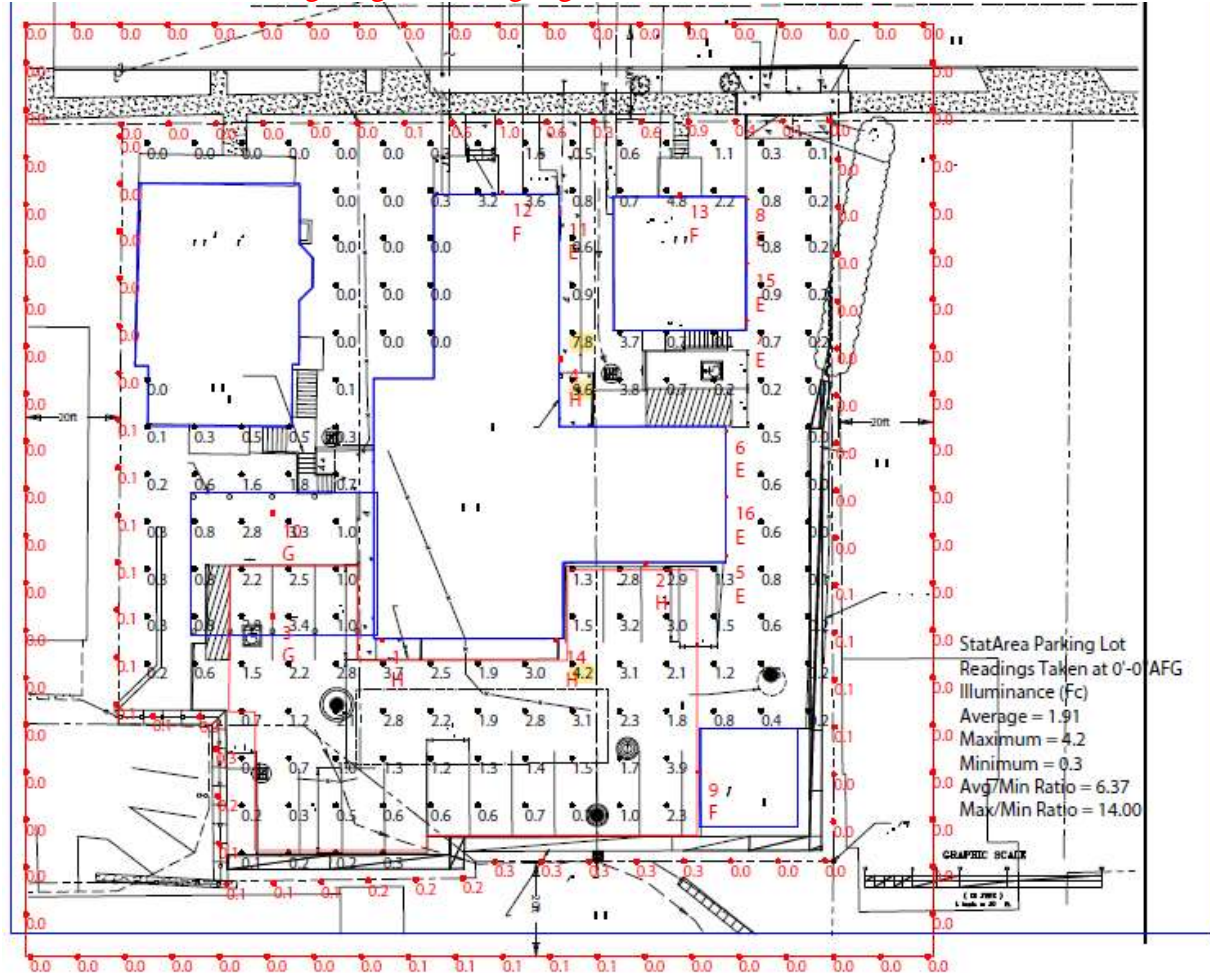
Heights vary from 2-12’. As the involved properties all sit on the cusp of the Burlington Ravine and have consistently struggled with the changing grade inherent to their site, this is the context of the neighborhood. Review of retaining walls greater than 3’ in height is the responsibility of the City Engineer.

(n) Public plazas and open space

While there are no formal public plazas included in the plan, “open green space” is annotated on Plan A1. This occurs between 11 Hungerford and the new 12 unit residential building, and north of the parking area. Given the large number of residential units proposed for the combined site, some outdoor amenity space is encouraged to be identified and programmed for the enjoyment of the tenants. Open space / common land is a requirement of PUDs under Article 11.

(o) Outdoor lighting

A photometric has been provided, with a revised plan received 7.30.2020. There are three spots that exceed allowable lighting limits, highlighted below.



- Building entrances, unless designated handicap access, may not exceed 5 fc. The common entry to 15 Hungerford Terrace has measurements as high as 9.6 fc, and should be adjusted downward.
- Parking lots are limited to a maximum illumination of 4 fc. There is a single reading that exceeds 4 fc (west of 15 Hungerford) which will require attention to bring light levels down.

(p) Integrate infrastructure into the design

Civil plan C2.3 shows a continuation of overhead electric service to both 21 Hungerford and the new 15 Hungerford building. New construction demands undergrounding of on-site utilities, Meters, utility connections, HVAC or similar mechanical equipment should be coordinated with the design of the building, and grouped in a service court out of public view. All need to be illustrated on elevations and/or site plans to determine appropriateness of location and necessity of screening.

No rooftop mechanicals are identified. If such units are proposed, they need to be provided with plans to be assessed for compliance with the standards of the ordinance.

The location of trash and recycling facilities is re-defined within the relocated garage at the southwesterly corner of the collective lots.

Residential mailboxes are identified along the public sidewalk, presumably in cluster box unit (“CBU”). **This is an undesirable solution for residential use**, due to its commercial appearance. An interior or sheltered porch location where unit boxes can be accessed by tenants is preferable and more consistent with residential use. The Common Entry on the south elevation or alternately at the Lounge location are recommended for resident mail delivery.

Part 3, Architectural Design Standards

Section 6.3.2 Review Standards

(a) Relate development to its environment:

1. Massing, Height and Scale:

Plan A9, A10 and A11 provide a modeled street view, illustrating the new building approximately the same height as the hipped roof of 11 Hungerford Terrace, to its north and 295 Pearl Street; on the corner of Pearl and Hungerford. The flat roof, however, allows for a building mass (and occupied third floor) that exceeds any of the existing buildings surrounding it. As viewed from the south and west (see rendered elevations A6, A7) the new building dominates the viewshed. The automotive service station on Pearl Street somewhat ameliorates the view from the north.

2. Roofs and Rooflines.

The new building has connected flat roofs; differing from either the north or south detached building that will abut it.

3. Building Openings

Building openings are symmetrically arranged on the primary façade, with rhythmic structural punctures on other elevations. Openings are grouped to provide the same floorplan plate-to-plate.

(b) Protection of Important Architectural Resources:

Burlington’s architectural and cultural heritage shall be protected through sensitive and respectful redevelopment, rehabilitation, and infill. Where the proposed development involves buildings listed or eligible for listing on a state or national register of historic places, the applicant shall meet the applicable development and design standards pursuant to Sec. 5.4.8. The introduction of new buildings to a historic district listed on a state or national register of historic places shall make every effort to be compatible with nearby historic buildings.

See Section 5.4.8.

(c) Protection of Important Public Views:

There are no protected important public views from this site. Not applicable.

(d) Provide an active and inviting street edge:

The removal and replacement of 15 Hungerford Terrace has introduced a substantially larger and more imposing structure to the streetscape. While there is no relationship in style or massing to the context of the older street, it does offer an identifiable front portal, the welcome of porches,

and larger windows to warm the streetface. Easterly porches have been extended to strengthen the horizontal element of the design, tying it in with neighboring properties.

(e) Quality of materials:

All development shall maximize the use of highly durable building materials that extend the life cycle of the building, and reduce maintenance, waste, and environmental impacts. Such materials are particularly important in certain highly trafficked locations such as along major streets, sidewalks, loading areas, and driveways. Efforts to incorporate the use of recycled content materials and building materials and products that are extracted and/or manufactured within the region are highly encouraged.

The applicants have revised their exterior sheathing plans at the recommendation of the DAB, now favoring fiber cement clapboards with a smaller area in fiber cement panels. Changes are intended to provide greater horizontality, as guided by the Board. Boral trim (with more interest provided to break up the visual massing) and MDO accent bands will complete the finish. Brick veneer has been extended vertically on the east, north and south as suggested by the DAB. Windows and doors are detailed on Plan A7. All are acceptable for new construction.

(f) Reduce energy utilization:

All new construction is required to meet the Guidelines for Energy Efficient Construction pursuant to the requirements of Article VI. Energy Conservation, Section 8 of the City of Burlington Code of Ordinances.

(g) Make advertising features complementary to the site:

No signage is proposed. Any signs will require a separate sign permit, consistent with the regulations of Article 7 and compliant to the residential zoning district standards.

(h) Integrate infrastructure into the building design:

See Section 6.2.2. (p.)

(i) Make spaces secure and safe:

All applicable building and life safety code as defined by the building inspector and fire marshal will be required. Building entrances need to be adequately illuminated (but not to exceed 5 fc.) Adequate lighting at building entrances will support resident safety. See lighting standards of Section 5.5.2 and 6.2.2. (o), above.

An intercom system is recommended to maximize personal safety of the residents in the new 12-unit structure.

Sec. 5.4.8 Historic Buildings and Sites

The City seeks to preserve, maintain, and enhance those aspects of the city having historical, architectural, archaeological, and cultural merit. Specifically, these regulations seek to achieve the following goals:

To preserve, maintain and enhance Burlington's historic character, scale, architectural integrity, and cultural resources;

To foster the preservation of Burlington's historic and cultural resources as part of an attractive, vibrant, and livable community in which to live, work and visit;

To promote a sense of community based on understanding the city's historic growth and development, and maintaining the city's sense of place by protecting its historic and cultural resources; and,

To promote the adaptive re-use of historic buildings and sites.

(a) Applicability:

These regulations shall apply to all buildings and sites in the city that are listed, or eligible for listing, on the State or National Register of Historic Places.

11 and 21 Hungerford Terrace (and their garages) are listed on the Vermont State Register of Historic Places and the National Register of Historic Places within the **Buell-Bradley Street Historic District**.

15 Hungerford Terrace is of construction that is more modern and identified as non-contributing due to age.

273 Pearl Street falls within the **Pearl Street Historic District** (#50, Lavoie Offices), but was identified as non-contributing to the district.

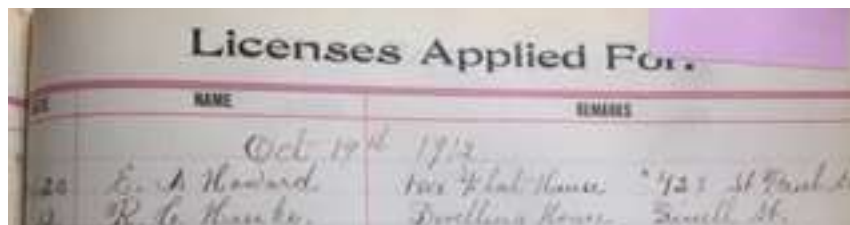
The following standards apply to 11 and 21 Hungerford Terrace:

(b) Standards and Guidelines:

The following development standards, following the Secretary of the Interior's Standards for the Treatment of Historic Properties, shall be used in the review of all applications involving historic buildings and sites subject to the provisions of this section and the requirements for Design Review in Art 3, Part 4. The Secretary of the Interior's Standards are basic principles created to help preserve the distinctive character of a historic building and its site. They are a series of concepts about maintaining, repairing and replacing historic features, as well as designing new additions or making alterations. These Standards are intended to be applied in a reasonable manner, taking into consideration economic and technical feasibility.

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

11 and 21 Hungerford Terrace will remain residential, although 11 Hungerford is now multi-unit. The existing garage at 11 Hungerford is proposed to be demolished in support of new development, as well as the southerly side porch at 21 Hungerford Terrace. The garage at 21 Hungerford will be moved to the rear of the lot to be utilized for one parking space and a trash location.



Issuance of a building permit for the construction of 11 Hungerford Terrace
October 24, 1912.

The elimination of the 11 Hungerford garage (1912) and porch at 21 Hungerford (between 1936-1942) alters the essential characteristics of the resources, and diminishes the integrity of the overall context of the site as documented in the National Register nomination. **The DAB previously offered their support of the proposal.**

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

See response above.



3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

No conjectural features are proposed.

4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

The southerly sunporch on 21 Hungerford Terrace is a typical feature that characteristically was added after the original construction of the single family home, adding to the significance of the overall structure. The porch is a feature that has acquired significance, consistent with 20th century evolutionary changes to residential architecture as promoted by Sears, Aladdin, Montgomery Wards and other national building plan providers. 21 Hungerford Terrace appears to be based on the Sears “Rembrandt” or “Van Jean” design, both of which were offered an option of a side porch. **The DAB offered their support of the proposal within the overall application, however, at their July 14, 2020 meeting.**

5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

The location of the garages behind residential buildings is characteristic of residential construction during the period of origin. The removal of the garage at 11 Hungerford and replacement with a paved surface parking lot advances development intensification rather than the original character of a residential neighborhood. Similarly, the addition of a side porch (popularized particularly in house plan catalogs) strongly supports the residential nature of this neighborhood as it was listed on the National Register of Historic Resources. Its proposed removal will diminish those essential and concomitant characteristics that collectively contribute to the overall feeling, association, and arrangement of the neighborhood. **The DAB has, however, provided their support for the loss of the garage and porch within the overall redevelopment proposal.**

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials recognizing that new technologies may provide an appropriate alternative in order to adapt to ever changing conditions and provide for an efficient contemporary use. Replacement of missing features will be substantiated by documentary and physical evidence.*

The object of the application is to remove a 1994 home and replace it with a 12 unit three story building with associated parking. The retaining walls will be new construction. A garage at 11 Hungerford that is in disrepair is proposed for demolition rather than repair and reuse. The applicant has provided a narrative (Exhibit G-11H) as to the condition of the



garage at 11 Hungerford and Exhibit SP-21H for the proposed porch removal at 21 Hungerford.

7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Building demolition of a garage and a porch is a permanent physical treatment. See Section 5.4.8 (d) below.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

No archaeological resources have been identified on these parcels.

9. *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.*

The proposed new multi unit residential building is much larger in massing than the abutting buildings, and will introduce a building of greater proportion. It is, however, minimized at the street front and designed with a modern vocabulary that is differentiated from the older building stock that surrounds it.

10. *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Although unlikely, if the replacement building at 15 Hungerford Terrace were removed, 11 and 21 Hungerford Terrace would remain and retain enough integrity to merit retention on the National Register of Historic Places. The large parking area proposed for the 15 Hungerford site would, on its own, be out of **character** for the existing neighborhood.

Items for the Board's consideration:

- Permits 18-1091CA (15 Hungerford) and 18-1092CA (21 Hungerford) must be successfully relinquished for the unit count to agree with the application materials.
- The Erosion Prevention and Sediment Control Plan as well as a Stormwater Plan are subject to review and written approval of the Stormwater Engineering Division.
- The retaining wall will require approval of the City Engineer.
- The applicant shall provide one new shade tree for every 5 parking spaces of the newly improved parking area, providing shade for at least 30% of the parking area.
- As submitted, light levels exceed allowable levels at **three** locations across the site. The applicant is advised to consult Section 5.5.2 of the ordinance, and address light levels as identified within 6.2.2. (o), above. A revised photometric will be required to demonstrate compliance.

- The proposed parking count, parking dimensions, and parking backup space are deficient to Table 8.1.8-1 and 8.1.11-1. The DRB has authority to provide relief in situations where a lesser standard is deemed necessary due to site topography, location of existing or proposed structures, lot configuration, and/or the need to preserve existing trees and mature vegetation.
- The parking requirement may be reduced through calculation of Inclusionary Housing. (8.1.8 (c))